INFO|GARD

InfoGard Responses to NVLAP VSTL Audit Non-Conformities

Item #	Non-conformity (X)	Assessor's Note	InfoGard Response
4.3.1	X	Two documents were reviewed; both had the same header information, but contained different information (QA 201 procedure).	Per QA 100, the controlled copies of policies and procedures of the Quality Manual are hard copies contained in a binder. The two documents reviewed were in two different formats – an electronic pdf format and the hard copy Word format of QA 201. The electronic pdf format of QA 201 was distributed to the auditor prior to the on-site audit for review. After analysis of the anomaly, it was determined that uncontrolled copies of the Quality Manual, which in this case is the electronic pdf format, be clearly marked with the following: "UNCONTROLLED COPY".
5.4.1.a	X	Not all test methods include sufficient detail in procedures and consideration for factors in 5.1.1, 5.4.1, and 5.4.4. Some specific examples are Usability and the Accuracy test methods.	Test Procedures have been enhanced to include additional detail in order to ensure testing has full consideration for all factors, aspects and expectations. This will augment our rigorous processes of thoroughly addressing each and every requirement and expectation of the program. Procedures within all of our specified methods have been enhanced including: Usability and Accessibility and Accuracy.
5.4.1.d	X	Need procedures for obtaining record of acceptance from client when a deviation to a test method is documented and authorized.	To augment our standard practice and to establish explicit evidence, a form, "Test Methods Customer Acknowledgement", has been added to the Quality Manual - QA 611, Appendix III. This form will inform the customer of the selected test methods and will explain any deviations from standard test methods and solicit approval for methods used.

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5.4.2.a	X	Test methods were adopted from Common Criteria methods but write-ups do not appear to have completed final editing to apply to voting systems applications and criteria besides the original security emphasis	Methods derived from ISO 17099 have been modified to more clearly reflect the elections terminology and to focus on the language, and narrower topic of specific elections equipment and system specifics and published requirements. The references to security have been generalized so they cannot be interpreted as encryption only, but also encompasses all security aspects of non-disclosure, integrity, and confidence that the device provides precisely the services expected.
5.4.2.b	X	Some of the standard test methods derived from Voting System standards need supplemental procedural details such as the setup of test vehicle for HAVA 301 requirements, criteria for ballot layout in Accuracy and Reliability testing, timing/sampling of voting in the 48 environmental testing, and the need to provide additional specification of table height in the accessibility standards.	Test procedures and method descriptions have been modified to provide additional details on all aspects of the evaluation process. Details included in the procedures include, but are not limited to, simulated election which specifics each of the election types including accuracy and reliability testing.

Details from the VVSG about the environmental test requirements have been translated into our procedures rather than referenced, including the time and rate of data input and sampling plan.

Specific parameters have been included in the procedures with regard to the validation of the correctness and appropriateness of the test setups and scenarios associated with accessibility and other qualification tests such as EMI. |
| **5.4.3.a** | X | Same as observation on 5.4.1.a except applied to laboratory developed methods. | Laboratory developed test methods and procedures have been enhanced to include additional detail in order to ensure testing has full consideration for all factors, aspects and expectations. This will augment our rigorous processes of thoroughly addressing each and every requirement and expectation of the program. |

Item #	Non-conformity (X)	Assessor's Note	InfoGard Response
5.4.4.a	X	Need to provide for identifying in test plans and reports any test methods included in the test campaign that are outside of the laboratory's scope of accreditation	A statement was included in the Scope section of the Test Report template. In addition, the Test Methods Customer Acknowledgement Form (QA 611, Appendix III) includes a field for identifying test methods that are outside the scope of InfoGard's accreditation.
5.4.5.2.a/b	X	Test methods have not been validated so records of validation are missing	QA 700, Section 4.3 states the validation process of test methods. QA 701 has been updated to include the test methods in the procedure. The log has also been updated to include test methods so that a record exists for controlling, validating, and distributing test methods.
5.10.2b	X	Location where tests were carried if different than the address of the lab	The Test Report template has been updated to include a table for the test location.
5.10.2.j	X	Authorization block for report needs to be added	The Test Report template has been updated to include an authorization signature block.
5.10.2.k	X	Statement that results only apply to identified equipment under test	Sections in the Test Report template have been updated to include the statement "The test results in this section apply to the identified equipment tested under Table x", with x being the table under the System Identification section. Please see the following sections of the Test Report template: • Certification Test Results and Recommendation • Test Operations and Findings